

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CARLYLE AVIATION MANAGEMENT LIMITED, ACCIPITER INVESTMENTS AIRCRAFT 4 LIMITED, VERMILLION AVIATION (TWO) LIMITED, ACCIPITER HOLDINGS DAC, MAVERICK AVIATION HOLDINGS LTD., MANCHESTER AVIATION FINANCE S.a.r.l., WELLS FARGO TRUST COMPANY, N.A., not in its individual capacity but solely in its capacity as OWNER TRUSTEE, UMB BANK, N.A., not in its individual capacity but solely in its capacity as OWNER TRUSTEE,

Plaintiffs,

v.

FRONTIER AIRLINES, INC.

Defendant.

Case No. 1:23-cv-04774 (PAE)

[Rel. 1:22-cv-02943 (PAE)]

NOTICE OF CROSS-MOTION

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, any reply papers filed in support, and all prior pleadings and proceedings herein, Defendant Counterclaim-Plaintiff Frontier Airlines, Inc. respectfully moves this Court, before the Honorable Paul A. Engelmayer, United States District Judge for the Southern District of New York, 40 Foley Square, Courtroom 1305, New York, New York 10007, for an order pursuant to Rule 42(a) of the Federal Rules of Civil Procedure consolidating the above-captioned action with the related action captioned *Frontier Airlines, Inc. v. AMCK Aviation Holdings Ireland Ltd.*, Case No. 22-cv-02943 (PAE) (S.D.N.Y.), and granting such further relief as the Court deems just and proper.

Dated: New York, New York
October 23, 2023

Respectfully Submitted,

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